

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

THE ESTATE OF LOUISE LONGUS
Perlia D. Smith, Personal Representative

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Plaintiff

v.

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Civil Action No.: 8:22-cv-00682-DKC

2101 FAIRLAND ROAD OPERATIONS,
LLC D/B/A FAIRLAND CENTER

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Defendant

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**DEFENDANT 2101 FAIRLAND ROAD OPERATIONS LLC D/B/A FAIRLAND
CENTER'S MOTION TO SET SCHEDULING CONFERENCE TO MODIFY
SCHEDULING ORDER**

Now comes Defendant Fairland Road Operations LLC d/b/a Fairland Center, by and through its undersigned counsel and pursuant to the Federal Rules of Civil Procedure, hereby files this Motion to respectfully request a scheduling conference to be set at the court's earliest convenience in the above-captioned matter, in order to modify the current Scheduling Order. Defendant states the following in support of its request:

1. A scheduling order was received in this matter on 5/23/23. Deadlines include: Defendant's Rule 26(a)(2) Disclosures by 8/21/23; Discovery by 10/5/23.
2. This is a complex medical malpractice case which will require more time than is provided in the current Scheduling Order for the parties to subpoena medical records, retain experts, and conduct written and deposition discovery.
3. This matter involves the decedent, Ms. Longus, who suffered from a complex medical history prior to her admission to Fairland Center including, but not limited to, history of breast cancer, multiple myeloma, peripheral vascular disease and deep venous thrombosis, pulmonary embolism on anticoagulation, and an above-the-knee

amputation just prior to her admission. The allegations surround an alleged fall that allegedly caused a humeral fracture, subdural hematoma, and death. Liability is vigorously contested and the allegation that Ms. Longus sustained a fall at Fairland Center is not conceded. This matter will require significant investigation into facts underlying liability, causation, and damages. Accordingly, this case will require the subpoena and review of voluminous medical records and is likely to involve multiple fact and medical expert witnesses.

4. Defendant respectfully requests a Scheduling Conference be held to allow for modification of the current Scheduling Order, including the deadlines for discovery and Rule 26(a)(2) disclosures, in order to provide the necessary time it will take for the parties to conduct discovery and depositions in this matter.

5. This is the first request for any change to the Scheduling Order in this matter.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant this Motion to Set a Scheduling Conference to Modify the Scheduling Order in this matter as requested herein, and request such other and further relief as this court deems just and proper.

Respectfully submitted,

/s/

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of June, 2023 a copy of the foregoing Motion to Set Scheduling Conference to Modify Scheduling Order, was served via PACER on the following attorney of record:

Donata Edwards, Esq.
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Attorney for Plaintiff

/s/
Christina R. Stringer #20115